

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION

THIS DOCUMENT RELATES TO:

**3:18-cv-15286-MAS-LHG** (Northwestern  
Mutual Life Insurance Co.)

Civil Action No.: 3:15-cv-07658-MAS-LHG

JUDGE MICHAEL A. SHIPP  
JUDGE LOIS H. GOODMAN

JUDGE DENNIS CAVANAUGH, RET.  
SPECIAL MASTER

**NOTICE OF MOTION FOR *PRO HAC*  
*VICE* ADMISSION OF MARK FLINN  
AND MEREDITH STEWART**

MOTION DAY: January 3, 2022

PLEASE TAKE NOTICE that on January 3, 2022, or as soon thereafter as counsel may be heard, the undersigned, counsel for Defendant J. Michael Pearson, shall move pursuant to Local Civil Rule 7.1 before the Honorable Michael A. Shipp, U.S.D.J., United States District Court, District of New Jersey, at the Courthouse located at 402 East State Street, Trenton, New Jersey 08608, for an Order admitting Mark Flinn and Meredith Stewart, of the law firm of Debevoise & Plimpton LLP, to appear before this Court *pro hac vice* for the purpose of acting as counsel to Defendant J. Michael Pearson in this action.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant J. Michael Pearson shall rely upon the annexed Declarations of Mark Flinn and Meredith Stewart.

It is respectfully requested that the Court rule upon this Motion, without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

Pursuant to Local Civil Rule 7.1(d)(4), Defendant submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this Motion is necessary because the *pro hac vice* admission of Mark Flinn and Meredith Stewart under Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and Defendant has submitted with this Motion Declarations of Mark Flinn and Meredith Stewart in support of the admission.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: December 8, 2021

DEBEVOISE & PLIMPTON LLP

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